

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SONRAI SYSTEMS, LLC,

Plaintiff,

vs.

ANTHONY M. ROMANO, GEOTAB, INC., and  
HEIL CO. D/B/A ENVIRONMENTAL  
SOLUTIONS GROUP,

Defendants.

Case No. 1:16-cv-03371

Hon. Thomas M. Durkin

Magistrate Judge Jeannice W. Appenteng

**PLAINTIFF SONRAI SYSTEMS, LLC'S MOTION FOR EXTENSION OF TIME TO  
RESPOND TO GEOTAB, INC.'S MOTION TO STRIKE**

Plaintiff Sonrai Systems, LLC ("Sonrai"), by and through its undersigned counsel, submits this Motion for Extension of Time to File Response to Defendant Geotab, Inc.'s Motion to Strike Inadmissible Evidence Cited in Sonrai's Response to Geotab's Summary Judgment Motion ("Motion"):

1. On December 18, 2023, Defendant Geotab, Inc. ("Geotab") filed its Motion for Extension of Time to File Response to Defendant Geotab, Inc.'s Motion to Strike Inadmissible Evidence Cited in Sonrai's Response to Geotab's Summary Judgment Motion. The Motion seeks to strike, among other things, Sonrai's summary judgment exhibits S-33, S-34, S-42, and S-43 for, in part, being disclosed after the close of fact discovery. On April 16, 2024, this Court ordered Sonrai to submit a response to the Motion by April 30, 2024. (Dkt. 636.)

2. Heil previously moved to strike certain documents that Sonrai disclosed after the close of discovery, including S-33, S-34, and S-43. (Dkt. 591.) On April 16, 2024, this Court ordered Sonrai and Heil to identify, in part, which of the disclosed documents were still in dispute and whether those documents were relied on by Sonrai's summary judgment briefs. (Dkt. 635.) After Heil filed a motion to clarify the Court's order, the Court reconsidered its previous order on

April 25, 2024, and directed: “1) Sonrai shall identify each late-produced document that it relied upon to support its summary judgment briefing or statement of material facts and 2) for each document relied upon, Sonrai shall provide a reason, if any, as to why the delayed production of that document was justified or harmless.” (Dkt. 639.) The deadline for this identification is May 15, 2024. (*Id.*)

3. Given this most recent order, the documents that both Geotab and Heil seek to strike overlap. In other words, S-33, S-34, S-42<sup>1</sup>, and S-43 were each part of disclosures that Sonrai made after the close of discovery and were relied non in Sonrai’s summary judgment response. Sonrai will, therefore, address the documents in both responses. Similarly, Sonrai will address whether the delayed production of each of these documents was justified or harmless in response to both Motions.<sup>2</sup>

4. Accordingly, Sonrai seeks an extension of the deadline by which to respond to Geotab’s Motion from April 30, 2024 to May 15, 2024. Sonrai also requests that it may make an omnibus response to Geotab’s and Heil’s motions totaling 25 pages.

5. If this Court disagrees with this approach, however, Sonrai requests only an extension of the deadline for filing a response to Geotab’s Motion. In other words, Sonrai requests leave to file both responses on May 15, 2024.

6. Sonrai makes this request in good faith, without any intention to unduly delay the proceedings.

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<sup>1</sup> S-42 was not addressed in Heil’s original motion to strike but is implicated by the Court’s April 25, 2024 Order (Dkt. 639).

<sup>2</sup> For the avoidance of doubt, Sonrai is not waiving its rights to respond to allegations made by Geotab and Heil that do not overlap.

7. As of the time of this filing, Sonrai has not received a response as to whether counsel for Geotab opposes this motion. Counsel for Heil opposes this motion.

**WHEREFORE**, for the foregoing reasons, Sonrai requests (a) an extension of time from April 30, 2024 to May 15, 2024; (b) leave to file an omnibus response totaling 25 pages, or in the alternative, two separate responses, both of which are due on May 15, 2024; and (c) for such and other relief as this Court deems necessary.

Dated: April 25, 2024

Respectfully submitted,

/s/ J. Scott Humphrey

J. Scott Humphrey

Katie M. Burnett

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 25, 2024, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey

One of the Attorneys for Plaintiff